

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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**In re**

**IGOR ERIC KUVYKIN,**

**Debtor.**  
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**Case No.:**  
**18-10760 -JLG**  
**In Proceedings for**  
**Reorganization under**  
**Chapter 11**

**DECLARATION OF SVETLANA SHNEYDERSTEN KUVYKIN  
IN SUPPORT OF THE APPLICATION FOR AUTHORITY TO RETAIN  
WAYNE GREENWALD, P.C., AS COUNSEL TO THE DEBTOR**

Svetlana Shneydersten Kuvykin, declares:

1. I am the above-named Debtor's wife.
2. I have personal knowledge of the facts stated herein.
3. I submit this declaration in support of the above-captioned Debtor and  
Debtor-in-possession's motion seeking an order authorizing him to retain Wayne  
Greenwald, P.C. as his attorneys in this case.

**Payment of the Initial Retainer**

4. I paid the initial \$5,000.00 retainer Wayne Greenwald, P.C.
5. The money for the payment came from my own funds.
6. As a co-obligor with the Debtor, I am deemed to be a creditor of the Debtor.
7. However, I am not asserting that claim against him.
8. Nor will I request repayment for the monies I advanced to Wayne Greenwald. P.C.
9. I was made aware of the case entitled *Lar Dan Enterprises, Inc.*, 221 B.R. 93 (Bankr.  
S.D.N.Y. 1998) ("*Lar Dan*") as it relates to my funding the Debtor's initial retainer to


Wayne Greenwald, P.C.

10. Accordingly, I represent:

- (i) I understand that any and all compensation received by Wayne Greenwald, P.C., from any source will be subject to review by this Court for reasonableness.
- (ii) The Debtor is fully aware of all facts relating to my paying Wayne Greenwald, P.A. the initial retainer and expressly consented to the payment.
- (iii) I discussed with the Debtor my paying the retainer and I understand that notwithstanding that payment Wayne Greenwald, P.C.'s undivided loyalty is to the Debtor and his estate alone, not me.
- (iv) If I need a lawyer in connection with the Debtor's case, I will retain an other, independent attorney.
- (v) There is no factual nor legal relationship between Wayne Greenwald, P.C. and me except that the firm has defended me in an action commenced by the chapter 7 trustee of Apco Merchant Services, Inc.
- (vi) Wayne Greenwald, P.C. advised me to discuss the payment be discussed with counsel of my choice. However; I decided not to consult with counsel concerning this payment.

I declare the foregoing statements of fact to be true and correct, under penalties of perjury, pursuant to 28 U.S.C. § 1746.

Dated: New York, NY  
July 23, 2018



Svetlana Shneydersten Kuvykin